## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

ELIZABETH PANZARELLA and JOSHUA PANZARELLA, individually and on behalf of all others similarly situated,

Plaintiffs,

No. 2:18-cv-03735-PBT

٧.

NAVIENT SOLUTIONS, LLC,

Defendant.

## SECOND STIPULATION AND PROPOSED ORDER

Plaintiffs Elizabeth Panzarella and Joshua Panzarella (together, "Plaintiffs") and defendant Navient Solutions, LLC ("Defendant"), by and through their respective counsel of record, stipulate as follows:

WHEREAS, Plaintiffs filed a Motion to Compel Discovery (the "Motion") on June 6, 2019 (Doc. 25);

WHEREAS, Defendant's response to the Motion was originally due on June 20, 2019; WHEREAS, on June 18, 2019, the parties filed a stipulation to extend Defendant's deadline to June 27, 2019;

WHEREAS, on June 19, 2019, the court granted the stipulation;

WHEREAS, to facilitate the parties' further attempts to resolve the issues addressed in the Motion, which have been and are continuing, the parties have agreed to further extend the date by which Defendant must respond to the Motion by an additional twelve (12) days, from June 27, 2019 to July 9, 2019.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through their respective counsel of record, that Defendant's time to respond to the Motion is extended by twelve (12) days, to and including July 9, 2019.

Dated: June 25, 2019

Respectfully submitted, GREENBERG TRAURIG, LLP

By: /s/ Lisa M. Simonetti

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Attorneys for Defendant Navient Solutions, LLC

Respectfully submitted, FRANCIS & MAILMAN, P.C.

By: /s/ James A. Francis

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Attorneys for Plaintiffs Elizabeth Panzarella and Joshua Panzarella

PURSUANT TO THE STIPULATION, IT IS SO ORDERED:

DATED: 6/26/19

HON. PETRESE B. TUCKER

UNITED STATES DISTRICT JUDGE